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 CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CHI NGUYEN,
 Plaintiff,
 vs.
 CLEAN HARBORS ENVIRONMENTAL
 SERVICES, INC., *et al.*,
 Defendants.

CASE NO.: 3-11-CV-00756-MMC

**STIPULATION AND [PROPOSED] ORDER
 TO CONTINUE DISCOVERY AND MOTION
 DEADLINES BY 30 DAYS; ORDER THEREON**

Motion To Be Decided on Papers

DEPT: Courtroom 7, 19th Floor
JUDGE: Hon. Maxine M. Chesney

ACTION FILED: February 18, 2011
TRIAL DATE: None

IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

All deadlines related to disclosure of rebuttal expert witnesses and reports and motions related thereto shall be vacated and continued by 30 days.

A continuance of said deadlines is necessary because the second day of Plaintiff's deposition, the second day of Defendant's Human Resources Director's deposition are not yet complete. Additionally, Defendant's retained human resources expert was called out of town, and has requested additional time to review Plaintiff's expert's 68-page report and provide a comprehensive response.

1 IT IS SO STIPULATED AND AGREED.

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3 DATED: October 23, 2012

4 /s/
Michael R. Bracamontes, Esq.
Bracamontes & Vlasak, P.C.
Attorney for Plaintiff

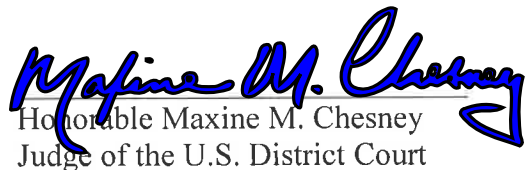
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6
7 DATED: October 23, 2012

8 /s/
Cortney L. McDevitt, Esq.
Jackson Lewis, LLP
Attorney for Defendant

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10 IT IS SO ORDERED that the deadlines concerning rebuttal experts only are vacated and reset as
11 follows:

- 12 1. The parties' deadline to disclose rebuttal expert witnesses shall be November 26, 2012.
13 2. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be November
14 30, 2012.
15 3. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be
16 ~~January 3, 2013.~~ January 4, 2013.

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18 Dated: October 26, 2012

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Honorable Maxine M. Chesney
Judge of the U.S. District Court

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